

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF MISSOURI**

In Re:)	
)	
Marriel L. Billingsley, <i>Debtor</i>)	
)	Case No. 11-44752-399
The Bank of New York Mellon fka The Bank of New York)	
as Trustee for the Certificateholders CWABS, Inc.,)	Chapter: 13
Asset-Backed Certificates, Series 2006-21, by BAC)	
Home Loans (TX), loan servicing agent for <i>Creditor</i>)	
)	
vs.)	
)	
Marriel L. Billingsley, <i>Debtor</i>		

**SECURED CREDITOR'S OBJECTION TO
CONFIRMATION OF CHAPTER 13 PLAN**

COMES NOW, The Bank of New York Mellon fka The Bank of New York as Trustee for the Certificateholders CWABS, Inc., Asset-Backed Certificates, Series 2006-21, by BAC Home Loans (TX), its successors or assigns, a secured creditor and objects to the Chapter 13 Plan for the following reasons:

1. The secured creditor is the holder of a promissory note in the principal sum of \$79,899.00, together with interest, secured by a lien on the real property of the Debtor located at 1627 CHESLEY DRIVE, ST. LOUIS, MO 63136.
2. The current unpaid principal balance on the note secured by the lien is \$83,455.53 together with interest from August 1, 2009, the due date of the last paid installment of said note.
3. The Debtor's plan is in violation of 11 U.S.C. §1325(a)(5)(B)(i) and (ii) in that the plan fails to provide provisions for on-going payments for the claim of The Bank of New York Mellon fka The Bank of New York as Trustee for the Certificateholders CWABS, Inc., Asset-Backed Certificates, Series 2006-21, by BAC Home Loans (TX).

WHEREFORE, having fully prayed, Creditor requests that confirmation of the proposed Chapter 13 plan be denied, and for such other and further relief as the Court deems proper.

SOUTH & ASSOCIATES, P.C.

_____/s/ Daniel A. West_____
Daniel A. West (MBE #48812; EDMO #98415; KSFD #70587)

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ATTORNEYS FOR CREDITOR

CERTIFICATE OF MAILING/SERVICE

I certify that a true copy of the Attached Pleading was served either electronically or via first class mail on June 17, 2011 upon the following parties:

Marriel L. Billingsley
1627 CHESLEY DRIVE
ST. LOUIS, MO 63136
DEBTOR

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ATTORNEY FOR DEBTOR

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TRUSTEE

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St. Louis, MO 63102
U.S. TRUSTEE

SOUTH & ASSOCIATES, P.C.
_____/s/ Daniel A. West_____
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